

EXHIBIT 1

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION
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4
5 MARK SNOOKAL, an individual,)
6 Plaintiff,)
7 v.) NO. 2:23-cv-6302-
8) HDV-AJR
9 CHEVRON USA, INC., a California)
10 Corporation, and DOES 1 through)
10, inclusive,)
10 Defendants.)

17 Videotaped deposition of MARK JORDAN
18 SNOOKAL, Plaintiff, taken on behalf of Defendants
19 at 333 South Hope Street, 43rd Floor, Los Angeles,
20 California, commencing at 10:00 a.m. on Friday,
21 May 10, 2024, before John M. Taxter, Certified
22 Shorthand Reporter No. 3579 in and for the State
23 of California, a Registered Professional Reporter.

1 APPEARANCES OF COUNSEL:

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1	Q	Well, let me ask: So when did you begin	16:17:13
2		seeing a therapist?	16:17:18
3	A	I believe it was sometime in 2020.	16:17:21
4	Q	During COVID?	16:17:25
5	A	It was during COVID, yes.	16:17:26
6	Q	And who is the therapist?	16:17:29
7	A	It -- I talked to a few people before	16:17:30
8		finally we settled on one therapist. It was	16:17:34
9		Eileen Baer, I believe her name was.	16:17:37
10	Q	How do spell Baer? "B-e-a-r"?	16:17:40
11	A	I'm not sure how you -- no. It's	16:17:43
12		like --	16:17:47
13	Q	Bayer aspirin --	16:17:47
14	A	Maybe, yeah.	16:17:48
15	Q	-- B-a-y-e-r?	16:17:49
16	A	I -- I think it was "B-e-a" -- or	16:17:50
17		B-a-e-r; something like that. It wasn't -- it --	16:17:55
18		it's in the --	16:17:57
19	Q	All right.	16:17:58
20	A	It's in the records.	16:17:59
21	Q	Are you still seeing her?	16:18:02
22	A	No.	16:18:03
23	Q	When did you stop seeing her?	16:18:05
24	A	Shortly after I resigned from Chevron.	16:18:07
25	Q	Why did you stop seeing her?	16:18:09

1 A Most of what we were talking about 16:18:12
2 was -- at that point, anyway, it was Chevron 16:18:14
3 and -- and being -- you know, ways to cope with 16:18:21
4 continued disappointment that was happening at 16:18:23
5 Chevron. I wasn't really discussing other issues 16:18:26
6 that I was having with her. 16:18:32
7 You know, the -- when I didn't go to 16:18:36
8 Escravos, it caused a lot of difficulty in my 16:18:44
9 family with my wife and my son, but it wasn't -- 16:18:46
10 it wasn't the kind of thing that I needed therapy 16:18:55
11 for; right? 16:19:02
12 My wife was upset. My son was upset. 16:19:03
13 We had him in a special school for some 16:19:06
14 developmental disabilities that he has and for 16:19:12
15 some mental health disabilities that he has, and 16:19:14
16 we weren't going to be able to send him to that 16:19:21
17 school anymore without the money from Nigeria. 16:19:24
18 But I didn't need the therapist to help 16:19:31
19 me talk to my son and my wife about that; right? 16:19:33
20 We had communication, and we were 16:19:37
21 working through that on our own. 16:19:39
22 She was really helping me with the 16:19:40
23 continued negative feelings that I was having just 16:19:47
24 by working for Chevron; right? 16:19:52
25 Q Because you weren't being promoted? 16:19:54

1 A Right, and watching other people be 16:19:56
2 promoted and essentially, in my mind, being 16:19:58
3 demoted and then not being particularly valued for 16:20:01
4 the work that I was doing even in the new position 16:20:04
5 that I was in. It wasn't new. In the position 16:20:07
6 that I was put back in. They held a -- an 16:20:13
7 employee, you know, like survey, engagement 16:20:22
8 survey, and there were a lot of feedback and a lot 16:20:25
9 of stuff, and Chevron wasn't really going to 16:20:27
10 address that. 16:20:30
11 And I -- I felt like, you know, that 16:20:31
12 made it difficult for me in that, you know, my 16:20:34
13 group had had a hard time through COVID and they 16:20:37
14 had had a hard time through the reorganization, 16:20:42
15 and it -- it didn't seem like Chevron was going to 16:20:45
16 help them any more than me. And so it just, you 16:20:48
17 know, was almost a daily -- daily thoughts about 16:20:53
18 how -- how much it wasn't that great to work there 16:21:00
19 anymore. 16:21:02
20 Q Did you see any other mental health 16:21:02
21 providers or -- 16:21:05
22 A I also took Cymbalta at the time, so I 16:21:07
23 had a psychiatrist just for prescribing. 16:21:12
24 Q And who was that? 16:21:19
25 A I don't re -- I don't recall her name. 16:21:19

1	Q	And what was the Cymbalta prescribed	16:21:24
2		for?	16:21:26
3	A	Depression, which is the same thing that	16:21:27
4		I was diagnosed with in therapy.	16:21:30
5	Q	Your therapist, Eileen Baer --	16:21:33
6	A	Uh-huh.	16:21:36
7	Q	-- diagnosed you with depression?	16:21:36
8	A	Uh-huh.	16:21:39
9	Q	And so she sent you to a	16:21:39
10		"psychologist" -- psychiatrist to get a	16:21:43
11		prescription?	16:21:44
12	A	Yes. That's the way it works at Kaiser.	16:21:44
13		You don't -- you don't really --	16:21:47
14	Q	How long it were you on Cymbalta?	16:21:48
15	A	I'm still on it.	16:21:50
16	Q	To this day?	16:21:51
17	A	Yes.	16:21:52
18	Q	And had you suffered depression earlier	16:21:52
19		in your career at Chevron?	16:21:55
20	A	No.	16:21:57
21	Q	Do you think you're still depressed	16:22:01
22		because of what happened at Chevron?	16:22:03
23	A	I am, yeah.	16:22:05
24	Q	Did you tell anyone at Chevron that your	16:22:16
25		job was affecting your mental health?	16:22:18

1	Q	And why was that?	17:17:19
2	A	I left because Georgia-Pacific has more	17:17:21
3		opportunities. It's a much larger company.	17:17:25
4		Nippon has one facility in the United States.	17:17:27
5		Georgia-Pacific has something like 140 or 150	17:17:30
6		facilities across the United States. They also	17:17:35
7		offered me a significant increase in pay, and I	17:17:37
8		would be overseeing a larger crew by about	17:17:43
9		50 percent. So more responsibility, better pay,	17:17:48
10		more future opportunity.	17:17:51
11	Q	Well, let me ask this: Did -- taking	17:17:52
12		the job at Nippon, moving up to Washington, did	17:17:55
13		that help with your emotional -- with your -- your	17:17:59
14		depression?	17:18:03
15	A	It helped some in that that I no longer	17:18:03
16		thought about Chevron like constantly because I	17:18:07
17		was there, but then I had the -- the added stress	17:18:10
18		of the fact that my son did not want to move	17:18:14
19		outside of Los Angeles; that I had to take him out	17:18:17
20		of that private school and put him in public	17:18:20
21		school where he has not done very well.	17:18:22
22	Q	Why hasn't he done well? Well, let me	17:18:26
23		ask this: What do you mean he hasn't done well?	17:18:29
24	A	He struggles academically because of his	17:18:33
25		mental condition and learning disabilities which	17:18:38

1 is why I had him in a private school in 17:18:45
2 Los Angeles that catered to those particular 17:18:47
3 disabilities. 17:18:52
4 Q What was the private school? 17:18:54
5 A Bridges Academy. 17:18:56
6 Q Where is that located? 17:18:57
7 A It's -- I forget the exact city, but 17:18:58
8 it's in the Valley. 17:19:02
9 MR. MUSSIG: Okay. Let's mark as 17:19:10
10 Exhibit 23 a letter from Mr. Snookal dated 17:19:15
11 August 14, 2023, to Mike "Savage" -- Savageaux -- 17:19:30
12 THE WITNESS: Savageaux. 17:19:35
13 MR. MUSSIG: -- at Nippon. 17:19:36
14 THE WITNESS: Like cup of Joe. That's 17:19:38
15 what he always used to say. 17:19:40
16 MR. MUSSIG: It's Bates-numbered 17:19:42
17 NDP-SDT_3. 17:19:43
18 THE WITNESS: Thank you. 17:19:56
19 THE STENOGRAPHIC REPORTER: Sure. 17:19:58
20 (Exhibit 23 was marked for 17:19:58
21 identification by the Certified 17:19:58
22 Shorthand Reporter.) 17:19:58
23 BY MR. MUSSIG: 17:19:58
24 Q This -- I -- this is your resignation 17:19:59
25 notice? 17:20:01

1 STATE OF CALIFORNIA)
2) SS.
3 COUNTY OF VENTURA)

4 I, John M. Taxter, a California Certified
5 Shorthand Reporter, Certificate No. 3579, a
6 Registered Professional Reporter, do hereby
certify:

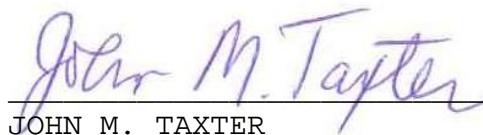
7 That the foregoing proceedings were taken
8 before me at the time and place therein set forth,
9 at which time the deponent was put under oath by
10 me; that the testimony of the deponent and all
11 objections made at the time of the examination
12 were recorded stenographically by me and were
13 thereafter transcribed; that the foregoing is a
14 true and correct transcript of my shorthand notes
15 so taken.

16 I further certify that I am neither counsel
17 for nor related to any party to said action.

18 The dismantling, unsealing, or unbinding of
19 the original transcript will render the Reporter's
20 Certificate null and void.

21 Pursuant to Federal Rule 30(e), transcript
22 review was requested.

23 Dated May 22, 2024.

24 
JOHN M. TAXTER
25 California Certified Shorthand
Reporter No. 3579, RPR

1

2

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4 I, John M. Taxter, Certified Shorthand Reporter,
5 CSR No. 3579, hereby certify:

6 The foregoing is a true and correct copy of the
7 original transcript of the proceedings taken by me
8 as thereon stated.

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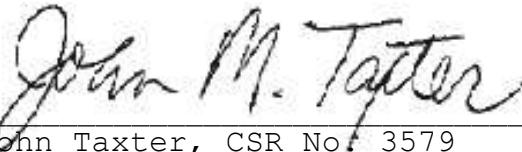
Dated: May 23, 2024

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John Taxter, CSR No. 3579

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